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June 9, 2017

Honorable Alison J. Nathan
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Yuri Lebedev and Trevon Gross*, 15-cr-769 (AJN)

Dear Judge Nathan:

I write on behalf of Defendant Trevon Gross to join in Yuri Lebedev's request to adjourn the sentencing in this matter to September, and to seek an extension of time to file a reply to the government's opposition to Mr. Gross's Rule 29 and 33 motions.

First, I seek an extension of time to file a reply to Mr. Gross's Rule 29 and 33 motions. The reply is currently due on June 20, 2017, and I seek an extension of time until July 7, 2017 to file the reply. When the government sought a second extension to file its opposition to Mr. Gross's post-trial motions, I consented as a professional courtesy, but informed the government that the timing of their filing would make it difficult for me to file the reply in two weeks due to deadlines on other matters. Given the timing issues, the government agreed that it would consent to an extension if it was necessary. On June 6, 2017, the government filed a 75-page opposition brief, and it will require considerable time and research to respond. The government has consented to an extension until June 30, 2017. While normally this would provide ample time to respond to the motion, I am traveling for business on other matters for 7 days during that timeframe. Due to this travel, other deadlines and the July 4 holiday, I request to file the reply on July 7, 2017.

I also join in Yuri Lebedev's request to schedule the sentencing in September, anytime through September 8, as I have a jury trial beginning on another matter on September 11 that is expected to last up to three weeks. The government opposes this request, and seeks to have the sentencing scheduled in July. We anticipate making a robust sentencing presentation, and will need additional time following the filing of our reply to our post-trial motions to prepare the sentencing memo.

Thank you for your consideration.

Respectfully submitted,

/s/ Kristen M. Santillo

KRISTEN M. SANTILLO